

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 17-mc-00151 (LPS)

**RED TREE INVESTMENTS, LLC'S
[PROPOSED] ORDER ON DISCOVERY SCHEDULE**

Red Tree Investments, LLC hereby proposes the following additional deadlines for discovery in anticipation of the Sale Hearing. An asterisk denotes a deadline that has already been set by the Court in its April 25, 2025 order, D.I. 1745.

For the avoidance of doubt, a party's acquiescence or failure to object to this order does not constitute an admission or concession that any discovery, disclosures, or reports provided for under this schedule are relevant. For the further avoidance of doubt, nothing in this order supersedes the Court's December 31, 2024 and January 27, 2025 orders, D.I. 1517; D.I. 1554, except insofar as it sets an agreed schedule for certain written discovery and document productions as contemplated in the December 31, 2024 order.

Event	Date	Rec. +
*Deadline for the Special Master to submit his Final Recommendation	June 11	N/A

Event	Date	Rec. +
Deadline to complete document productions in response to discovery requests served before the date this schedule is entered ¹	June 20	+9
*Deadline for the filing of any objections to the Special Master's Final Recommendation	June 20	+9
Opening expert reports due	June 20	+9
Deadline to serve written discovery on the party (or parties) whose bid is selected as the Final Recommendation, or on a Competing Objector ²	June 23	+12
Deadline to serve responses and objections for discovery requests served after the Final Recommendation	June 25	+14
Deadline to meet and confer regarding the scope of discovery to be produced in response to discovery requests served after submission of the Final Recommendation	June 26	+15
*Deadline for the filing of responses to objections to the Special Master's Final Recommendation	June 27	+16
Deadline to substantially complete document productions in response to discovery requests served after the date this schedule is entered	July 3	+22
*Deadline for the filing of replies regarding any objections to the Special Master's Final Recommendation	July 3	+22
Deadline to serve witness disclosures pursuant to FRCP 26(a)(3)	July 7	+26
Deadline to serve responsive expert reports	July 8	+27

¹ *First*, as to the Special Master's production, this deadline is a targeted one because the Special Master plans to collect, review, and produce documents created through June 11.

Second, because this deadline falls on the same day that objections to the Special Master's Final Recommendation are due, a party does not, merely by failing to cite a document produced by another party on or immediately before June 20 (and to which the receiving party otherwise did not have access), waive the right to make an objection in its reply brief or at the Sale Hearing based on that document. For the avoidance of doubt, this footnote does not preclude a party from objecting to another party's invocation of or reliance on any document for any reason.

² A Competing Objector is any party objecting to the Final Recommendation on the basis that its bid should have been selected as the Final Recommendation instead.

Event	Date	Rec. +
Deadline to notice witness depositions	July 9	+28
*Deadline for the Special Master to submit Joint Status Report	July 10	+29
Deadline to serve reply expert reports	July 14	+33
*Conclusion of the discovery period	July 17	+36
Deadline to disclose exhibits pursuant to FRCP 26(a)(3) ³	July 19	+38
Deadline to serve objections to FRCP 26(a)(3) exhibit disclosures	July 21	+40
*Commencement of the Sale Hearing	July 22	+41

Dated: _____
Wilmington, Delaware

HONORABLE LEONARD P. STARK
UNITED STATES DISTRICT COURT

³ The Court previously ordered that the Special Master's Joint Status Report due to the Court on July 10 should include a witness list and allocation of time across parties. D.I. 1741 ¶ 3.